

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**RESPONSE OF COALITION FOR GOOD GOVERNANCE TO
BRAD RAFFENSPERGER’S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS**

Plaintiff Coalition for Good Governance (“Coalition”) responds to Brad Raffensperger’s First Request for Production of Documents as follows (“the Requests”). The defined terms in this Response are the same as those in the Requests. Note: for the purpose of these responses, the term “responsive documents” means documents in Coalition’s possession or control and does not include privileged attorney client communication or work product.

Request 1

All of your financial books and records, including balance sheets, bank statements, ledgers, and expense reports, that reflect any diversion of financial resources as a result of your challenges to the Election System and/or the

Coalition objects because the requested documents are not relevant to the claim or defense of any party. However, no documents will be withheld based on this objection; responsive documents exist and will be produced.

Request 15

All communications that you sent to potential or actual voters in Georgia from January 1, 2017 to the present. This includes electronic communications via text message or electronic mail. This request does not include social media posts that are generally accessible.

Coalition Response

Coalition objects to this request as overly broad and unduly burdensome. The “potential or actual voters in Georgia” that Coalition communicates with includes almost everyone with which Coalition communicates which includes thousands of Georgia residents. The request for “all communications” includes any communication, regardless of whether such communication is relevant to any claim or defense of any party or not. Coalition also objects to this Request as it seeks information subject to attorney-client, work product, common interest, or other applicable privilege. On the basis of these objections, Coalition will not produce any documents in response to this Request.

Request 16

All documents reflecting any and all fundraising solicitations in connection with the Litigation and/or your challenges to the Election System.

Coalition Response

Coalition objects because the requested documents are not relevant to the claim or defense of any party. Responsive documents exist, but none will be produced.

Request 17

All documents reflecting all donations or contributions received by the Coalition in response to any fundraising solicitation(s) in connection with the Litigation and/or your challenges to the Election System.

Coalition Response

Coalition objects because the requested documents are not relevant to the claim or defense of any party. Responsive documents exist, but none will be produced.

Request 18

All documents and communications that relate to the Coalition's identification and tracking of individuals allegedly affected by the Election System.

Coalition Response

Coalition objects to this request because it is vague and does not identify any particular document or category of documents. On the basis of this objection, no documents will be produced. However, to the extent this Request means documents describing how individuals are affected by the Election System in the form of declarations, to that extent this Request is not objectionable and such documents exist, and, to the extent that they have not already been filed in this Action, will be produced.

Request 19

All documents related to communications with anyone the Coalition claims was affected by the Election System.

Coalition Response

Coalition objects to this request because it does not identify any particular document or category of document, but instead consists of an interrogatory – asking Coalition to first identify such persons – and then to produce documents reflecting communications with such persons. The request also is overly broad in that every voter is “affected” by the Election System in some way, so the request encompasses every communication with every Georgia voter. Responsive documents exist, but will not be produced.

Request 20